MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY

Crosbie Foundry Company, Inc.
1600 Mishawaka Street
Elkhart, Indiana 46514

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1,, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-13601-00202	
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 2, 2001 Expiration Date: October 2, 2006

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 and A.2 are descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a nickel, aluminum, brass and casting processing source.

Authorized Individual:	Daniel Crosbie
Source Address:	1600 Mishawaka Street, Elkhart, Indiana 46514
Mailing Address:	1600 Mishawaka Street, Elkhart, Indiana 46514
Phone Number:	219-262-1502
SIC Code:	3369
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(a) One (1) nickel castings process with a process rate of 320 pounds of nickel per hour, consisting of the following equipment:

(1) Two (2) crucible pot furnaces, known as CF-16 and CF-17, equipped with two baghouses CB-4 and CB-5, exhausted to stacks C-2, C-3 and C-4, rated at 0.950 million British thermal units per hour, each.

(2) One (1) barrel shot blast, known as CF-24, equipped with a baghouse CB-8, exhausted to stack V-8.

(3) Six (6) polish lathes, known as CF-30, 31, 33, 34, 36 and 37, and two (2) grinding lathes, known as CF-32 and 35, all equipped with cyclone CC-1, connected in series to baghouses CB-1 and CB-2, exhausted to stack C-6.

(b) One (1) aluminum and brass castings process with a process rate of 540 pounds when using aluminum and 1,000 pounds per hour when using brass, consisting of the following equipment:

(1) Two (2) electric induction furnaces, known as CF-18 and CF-19, equipped with two (2) baghouses, CB-4 and CB-5, exhausted to stacks C-2, C-3 and C-4.

(2) Three (3) grind lathes, known as CF-38 through CF-40, and one (1) sand blaster, known as CF-27, all equipped with cyclone CC-5, exhausted to stack C-7.

(3) One (1) cabinet shot blaster, known as CF-25 and one (1) polisher, known as CF-

29, equipped with cyclone CC-2 connected in series to baghouse CB-3, exhausted to stack C-7.

(4) One (1) belted shot blast, known as CF-26, equipped with baghouse CB-7, exhausted into the building.

(5) One (1) abrasive cut off saw, known as CF-28, equipped with cyclone CC-3 connected in series to baghouse CB-6, exhausted to stack C-8.

(6) One shake out area, equipped with cyclone CC-6, exhausted to stack V-4.

(c) One (1) sand casting process with a process rate of 6,664 pounds of bank sand, clay and core sand per hour, consisting of the following equipment:

(1) One (1) natural gas-fired core machine, known as CF-15, exhausted to stack S-1, rated at 0.108 million British thermal units per hour.

(2) Three (3) sand mullers, known as CF-20, CF-21, and CF-22, exhausted to stack V-5.

(3) One (1) ring muller, known as CF-23, exhausted to C-1.

(d) One (1) natural gas-fired water heater, known as CF-1, rated at 0.034 million British thermal units per hour.

(e) Four (4) natural gas-fired furnaces, known as CF-2 through CF-5, rated at 0.0825, 0.10, 0.080, and 0.125 million British thermal units per hour, respectively.

(f) Five (5) natural gas-fired infrared heaters, known as CF-6 through CF-10, rated at 0.03 million British thermal units per hour, each.

(g) Two (2) natural gas-fired infrared heaters, known as CF-11 and CF-12, rated at a maximum capacity of 0.06 million British thermal units per hour, each.

(h) Two (2) natural gas-fired infrared heaters, known as CF-13 and CF-14, rated at a maximum capacity of 0.10 million British thermal units per hour, each.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of operating permits pursuant to 326 IAC 2 (Permit Review Rules).

B.5 Minor Source Operating Permit [326 IAC 2-6.1]

(a) This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1.

(b) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

(c) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in this permit. If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit of all criteria pollutants is less than two hundred fifty (250) tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential to emit PM_{10}, SO_2, VOC, NO_X or CO to 100 tons per year from this source, shall cause this source to be considered a major source under 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

C.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-7]

Any change or modification which may increase potential to emit to ten (10) tons per year of any single hazardous air pollutant, twenty-five (25) tons per year of any combination of hazardous air pollutants from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

C.3 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.4 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.5 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.6 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to 326 IAC 2-6.1-6(d)(3):

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by a notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.7 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.8 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.9 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.10 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

Testing Requirements

C.11 Performance Testing [326 IAC 3-6] [326 IAC 2-1.1-11]

(a) Compliance testing on new emissions units shall be conducted within sixty (60) days after achieving maximum production rate, but no later than one hundred eighty (180) days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ, within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.12 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.13 Maintenance of Monitoring Equipment [IC 13-14-1-13]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour this time frame is determined on a case by case basis until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.15 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-6.1-4(4)(C)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure

compliance with permit conditions requiring the measurement of pressure drop or other parameters.

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.18 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.19 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) With the exception of performance tests conducted in accordance with Section C- Perform-

ance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.21 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) The reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) A malfunction as described in 326 IAC 1-6-2; or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required com-

pliance monitoring is a deviation.

(e) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(f) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.22 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) nickel castings process with a process rate of 320 pounds of nickel per hour, consisting of the following equipment:

(1) Two (2) crucible pot furnaces, known as CF-16 and CF-17, equipped with two baghouses CB-4 and CB-5, exhausted to stacks C-2, C-3 and C-4, rated at 0.950 million British thermal units per hour, each.

(2) One (1) barrel shot blast, known as CF-24, equipped with a baghouse CB-8, exhausted to V-8.

(3) Six (6) polish lathes, known as CF-30, 31, 33, 34, 36 and 37, and two (2) grinding lathes, known as CF-32 and 35, all equipped with cyclone CC-1, connected in series to baghouses CB-1 and CB-2, exhausted to C-6.

(b) One (1) aluminum and brass castings process with a process rate of 540 pounds when using aluminum and 1,000 pounds per hour when using brass, consisting of the following equipment:

(1) Two (2) electric induction furnaces, known as CF-18 and CF-19, equipped with two (2) baghouses, CB-4, CB-5, exhausted to stacks C-2, C-3 and C-4.

(2) Three (3) grind lathes, known as CF-38 through CF-40, and one (1) sand blaster, known as CF-27, equipped with cyclone CC-5, exhausted to C-7.

(3) One (1) cabinet shot blaster, known as CF-25 and one (1) polisher, known as CF-29, equipped with cyclone CC-2 connected in series to baghouse CB-3, exhausted to C-7.

(4) One (1) belted shot blast, known as CF-26, equipped with baghouse CB-7, exhausted into the building.

(5) One (1) abrasive cut off saw, known as CF-28, equipped with cyclone CC-3 connected in series to baghouse CB-6, exhausted to C-8.

(6) One shake out area, equipped with cyclone CC-6, exhausted to V-4.

(c) One (1) sand casting process with a process rate of 6,664 pounds of bank sand, clay and core sand per hour, consisting of the following equipment:

(1) One (1) natural gas-fired core machine, known as CF-15, exhausted to S-1, rated at 0.108 million British thermal units per hour.

(2) Three (3) sand mullers, exhausted to V-5, known as CF-20, CF-21, and CF-22.

(3) One (1) ring muller, exhausted to C-1, known as CF-23.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations):

(a) The particulate matter (PM) from the nickel casting process shall be limited to 1.2 pounds per hour when operating at a process weight rate of 320 pounds of nickel per hour.

(b) The particulate matter (PM) from the aluminum casting process shall be limited to 1.7 pounds per hour when operating at a process weight rate of 540 pounds of aluminum per hour.

(c) The particulate matter (PM) from the brass casting process shall be limited to 2.58 pounds per hour when operating at a process weight rate of 1000 pounds of brass per hour.

(d) The particulate matter (PM) from the sand casting process shall be limited to 9.18 pounds per hour when operating at a process weight rate of 6,664 pounds of bank sand, clay and core sand per hour.

(e) The following equation was used to calculate the above limits:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour.

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for these emissions unit and their control devices.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.3 Particulate Matter (PM)

The baghouses and cyclones for PM control shall be in operation at all times when the nickel, aluminum, brass and sand casting processes are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.4 Visible Emissions Notations

(a) Visible emission notations of the nickel, aluminum, brass and sand casting operations stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.5 Parametric Monitoring

(a) The Permittee shall record the total static pressure drop across baghouses CB-1, CB-2, CB-3, CB-4, CB-5, CB-6, CB-7 and CB-8 used in conjunction with the casting operations, at least once per shift when the casting process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across CB-1, CB-2, CB-3, CB-4, CB-5, CB-6, CB-7 and CB-8 shall be maintained within the range of 1.0 and 5.0, inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the casting operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.8 Cyclone Inspections

An inspection shall be performed each calender quarter of all cyclones controlling the casting operations when venting to the atmosphere. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.

D.1.9 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.10 Record Keeping Requirements

(a) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the nickel, aluminum, brass and sand casting operation stack exhaust.

(b) To document compliance with Conditions D.1.5, D.1.6 and D.1.8, the Permittee shall maintain records of the results of the inspections required under Condition D.1.5 , D.1.8 and D.1.7 and the dates the vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(d) One (1) natural gas-fired water heater, known as CF-1, rated at 0.034 million British thermal units per hour.

(e) Four (4) natural gas-fired furnaces, known as CF-2 through CF-5, rated at 0.0825, 0.10, 0.080, and 0.125 million British thermal units per hour, respectively.

(f) Five (5) natural gas-fired infrared heaters, known as CF-6 through CF-10, rated at 0.03 million British thermal units per hour, each.

(g) Two (2) natural gas-fired infrared heaters, known as CF-11 and CF-12, rated at a maximum capacity of 0.06 million British thermal units per hour, each.

(h) Two (2) natural gas-fired infrared heaters, known as CF-13 and CF-14, rated at a maximum capacity of 0.10 million British thermal units per hour, each.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

There are no applicable requirements for these emission units.

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES ?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. : _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20_____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM / PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

*** Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Crosbie Foundry Company, Inc.**
Address:	**1600 Mishawaka Street**
City:	**Elkhart, Indiana 46514**
Phone #:	**219-262-1502**
MSOP #:	**039-13601-00202**

I hereby certify that Crosbie Foundry Company, Inc. is **9** still in operation.
9 no longer in operation.

I hereby certify that Crosbie Foundry Company, Inc. is
9 in compliance with the requirements of MSOP 039-13601-00202.
9 not in compliance with the requirements of MSOP 039-13601-00202.

Authorized Individual (typed):	**Daniel Crosbie**
Title:	
Signature:	
Date:	

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for New Construction and Operation

Source Name:	**Crosbie Foundry Company, Inc.**
Source Location:	**1600 Mishawaka Street, Elkhart, Indiana 46514**
County:	**Elkhart**
SIC Code:	**3369**
Operation Permit No.:	**MSOP 039-13601-00202**
Permit Reviewer:	**Paula M. Cognitore**

On August 9, 2001, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Crosbie Foundry Company, Inc. had applied for an operating permit to operate a nickel, aluminum, brass and sand casting processing source with baghouses and cyclone for control The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On September 11, 2001, Michael A. Furfaro of Envirocorp, on behalf of Crosbie Foundry Company, Inc. submitted comments on the proposed operating permit. The summary of the comments and corresponding responses are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**

Comment 1:

A reference is made in Section D.1.5 of specifications for pressure gauges in Section C. No such section was found in the draft permit. Please include this information in the final permit preparation to allow for Crosbie to assure it is meeting it's obligations under this permit.

Response 1:

The following condition was added to the permit and Section C has been renumbered accordingly:

C.15 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-6.1-4(4)(C)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Comment 2:

Crosbie is in the process of adding an additional pollution control device to control particulates in the shake out area. A cyclone, CC-6, has been added that is connected to V-4. This pollution control equipment does not change the potential to emit for the facility, but provides the means to minimize the release of particulate matter in this area. We have included a new Form Q-1 for the cyclone, revised Form FF, revised the equipment location map, and revised Form E for the brass and aluminum castings.

Response 2:

The following revisions have been made to Section A.2, Section D.1:

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(b) One (1) aluminum and brass castings process with a process rate of 540 pounds when using aluminum and 1,000 pounds per hour when using brass, consisting of the following equipment:

(1) Two (2) electric induction furnaces, known as CF-18 and CF-19, equipped with two (2) baghouses, CB-4 and CB-5, exhausted to stacks C-2, C-3 and C-4.

(2) Three (3) grind lathes, known as CF-38 through CF-40, and one (1) sand blaster, known as CF-27, all equipped with cyclone CC-5, exhausted to stack C-7.

(3) One (1) cabinet shot blaster, known as CF-25 and one (1) polisher, known as CF-29, equipped with cyclone CC-2 connected in series to baghouse CB-3, exhausted to stack C-7.

(4) One (1) belted shot blast, known as CF-26, equipped with baghouse CB-7, exhausted into the building.

(5) One (1) abrasive cut off saw, known as CF-28, equipped with cyclone CC-3 connected in series to baghouse CB-6, exhausted to stack C-8.

(6) One shake out area, **equipped with cyclone CC-6,** exhausted to stack V-4.

Upon further review, the OAQ has decided to make the following changes to the MSOP: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Change 1:

The following condition, has been added to Section D.1 and the entire D.1 section has been renumbered to reflect this change:

D.1.8 Cyclone Inspections

An inspection shall be performed each calender quarter of all cyclones controlling the casting operations when venting to the atmosphere. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.

Change 2:

The following change has been made to Condition D.1.9 for clarification:

D.1.9 **Cyclone** Failure Detection

In the event that ~~bag~~ **cyclone** failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Change 3:

The following revision has been made to Condition D.1.10:

D.1.10 Record Keeping Requirements

(a) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the nickel, aluminum, brass and sand casting operation stack exhaust.

(b) To document compliance with Conditions D.1.5 ~~and~~ D.1.6 **and D.1.8**, the Permittee shall maintain records of the results of the inspections required under Condition D.1.5 ~~and~~ D.1.6 **and D.1.8** and the dates the vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name:	**Crosbie Foundry Company, Inc.**
Source Location:	**1600 Mishawaka Street, Elkhart, Indiana 46514**
County:	**Elkhart**
SIC Code:	**3369**
Operation Permit No.:	**MSOP 039-13601-00202**
Permit Reviewer:	**Paula M. Cognitore**

The Office of Air Quality (OAQ) has reviewed an application from Crosbie Foundry Company, Inc. relating to the operation of a nickel, aluminum, brass and sand casting processing source.

This source is not one of the 28 major PSD source categories because the source only processes pure aluminum, brass and nickel feed stock from ingots.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) nickel castings process with a process rate of 320 pounds of nickel per hour, consisting of the following equipment:

(1) Two (2) crucible pot furnaces, known as CF-16 and CF-17, equipped with two baghouses CB-4 and CB-5, exhausted to stacks C-2, C-3 and C-4, rated at 0.950 million British thermal units per hour, each.

(2) One (1) barrel shot blast, known as CF-24, equipped with a baghouse CB-8, exhausted to stack V-8.

(3) Six (6) polish lathes, known as CF-30, 31, 33, 34, 36 and 37, and two (2) grinding lathes, known as CF-32 and 35, all equipped with cyclone CC-1, connected in series to baghouses CB-1 and CB-2, exhausted to stack C-6.

(b) One (1) aluminum and brass castings process with a process rate of 540 pounds when using aluminum and 1,000 pounds per hour when using brass, consisting of the following equipment:

(1) Two (2) electric induction furnaces, known as CF-18 and CF-19, equipped with two (2) baghouses, CB-4 and CB-5, exhausted to stacks C-2, C-3 and C-4.

(2) Three (3) grind lathes, known as CF-38 through CF-40, and one (1) sand blaster, known as CF-27, all equipped with cyclone CC-5, exhausted to stack C-7.

(3) One (1) cabinet shot blaster, known as CF-25 and one (1) polisher, known as CF-29, equipped with cyclone CC-2 connected in series to baghouse CB-3, exhausted to stack C-7.

(4) One (1) belted shot blast, known as CF-26, equipped with baghouse CB-7, exhausted into the building.

(5) One (1) abrasive cut off saw, known as CF-28, equipped with cyclone CC-3 connected in series to baghouse CB-6, exhausted to stack C-8.

(6) One shake out area, exhausted to stack V-4.

(c) One (1) sand casting process with a process rate of 6,664 pounds of bank sand, clay and core sand per hour, consisting of the following equipment:

(1) One (1) natural gas-fired core machine, known as CF-15, exhausted to stack S-1, rated at 0.108 million British thermal units per hour.

(2) Three (3) sand mullers, known as CF-20, CF-21, and CF-22, exhausted to stack V-5.

(3) One (1) ring muller, known as CF-23, exhausted to C-1.

(d) One (1) natural gas-fired water heater, known as CF-1, rated at 0.034 million British thermal units per hour.

(e) Four (4) natural gas-fired furnaces, known as CF-2 through CF-5, rated at 0.0825, 0.10, 0.080, and 0.125 million British thermal units per hour, respectively.

(f) Five (5) natural gas-fired infrared heaters, known as CF-6 through CF-10, rated at 0.03 million British thermal units per hour, each.

(g) Two (2) natural gas-fired infrared heaters, known as CF-11 and CF-12, rated at a maximum capacity of 0.06 million British thermal units per hour, each.

(h) Two (2) natural gas-fired infrared heaters, known as CF-13 and CF-14, rated at a maximum capacity of 0.10 million British thermal units per hour, each.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment

There are no new facilities proposed at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

Registration 039-6205-00202, issued on November 12, 1996.

All conditions from previous approvals were incorporated into this permit except the following:

Registration 039-6205-00202, issued on November 12, 1996

326 IAC 2-1 (State construction and operating permits: rule applicability)
Pursuant to 326 IAC 2-1 (State construction and operating permits: rule applicability) the total particulate matter allowable emissions for shot blasting, induction furnace, crucible pot, sand handling, polishing and grinding equipment shall not exceed 5.7 pounds per hour.

Reason not incorporated: A source cannot be limited out of a permit level; therefore Crosbie Foundry Company is subject to requirements of 326 IAC 2-6.1.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
C-1	Ring Muller	15.0	0.92	2,500	Ambient
C-2	Crucible	15.0	0.75	3,333	165
C-3	Crucible	15.0	0.75	3,333	15.0
C-4	Crucible	15.0	0.75	3,333	165
C-6	Polish	10.0	0.75	3,000	Ambient
C-6	Polish	15.0	0.75	3,000	Ambient
C-7	Sand Blast / Polisher	10.0	0.75	1,200	Ambient
C-8	Saw	10.0	0.75	2,500	Ambient
C-9	Grind	10.0	0.75	1,800	Ambient
V-4	Shakeout	16.0	2.33	10,000	Ambient
V-5	Porto Mullers	15.0	2.33	10,000	Ambient
V-8	Barrel Blast	18.0	2.0	4,800	Ambient
S-1	Core Machine	11.0	0.50	2,100	Ambient

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 8, 2000, with additional information received on July 2, 2001.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are summarized on pages 1 through 3 of Appendix A of this document.

The source applied for a registration renewal and based upon changes in emission calculations since R 039-6205-00202 was issued the source will be subject to the requirements of a Minor Source Operating Permit.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	**Potential To Emit** (tons/year)
PM	91.1
PM_{10}	82.0
SO_2	0.003
VOC	0.024
CO	0.368
NO_X	0.438

HAPs	**Potential To Emit** (tons/year)
Benzene	0.000009
Dichlorobenzene	0.000005
Formaldehyde	0.0003
Hexane	0.008
Toluene	0.00001
Lead	0.600
Cadmium	0.000005
Chromium	0.000006
Manganese	0.000002
Nickel	0.000009
TOTAL	0.608

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM and PM10 are equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPS**
Nickel Casting	5.26	82.0	-	-	-	-	0.600
Aluminum Casting	7.45		-	-	-	-	
Brass Casting	11.3		-	-	-	-	
Sand Casting	40.2		-	-	-	-	
Combustion	0.008	0.033	0.003	0.024	0.368	0.438	0.008
Total Emissions	64.2	82.0	0.003	0.024	0.368	0.438	0.068

Note: The PM emissions are the 326 IAC 6-3-2 allowables.

County Attainment Status

The source is located in Elkhart County.

Pollutant	**Status**
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Elkhart County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit MSOP 039-13601-00202, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than one hundred (100) tons per year,

(b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and

(c) any combination of HAPs is less than twenty-five (25) tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Elkhart County and the potential to emit PM and PM_{10} is less than one hundred (100) tons per year and the potential to emit VOC is less than ten (10) tons per year; therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9

or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the nickel casting process shall be limited to 1.2 pounds per hour when operating at a process weight rate of 320 pounds of nickel per hour.

(a) The particulate matter (PM) from the aluminum casting process shall be limited to 1.7 pounds per hour when operating at a process weight rate of 540 pounds of aluminum per hour.

(b) The particulate matter (PM) from the brass casting process shall be limited to 2.58 pounds per hour when operating at a process weight rate of 1000 pounds of brass per hour.

(c) The particulate matter (PM) from the sand casting process shall be limited to 9.18 pounds per hour when operating at a process weight rate of 6,664 pounds of bank sand, clay and core sand per hour.

(d) The following equation was used to calculate the above limits:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour.

Since the total potential to emit for PM, after controls, is 3.55 tons per year, equivalent to 0.228 pounds per hour, the process esin (a) through (d) comply with this rule.

The baghouses and cyclones shall be in operation at all times the nickel, aluminum, brass and sand casting process are in operation, in order to comply with this limit.

Testing Requirements

Since no single unit has more than 40% of the total PM emissions and the total PM potential to emit is less than 100 tons per year stack testing is not required.

Compliance Requirements

The compliance monitoring requirements applicable to this source are as follows:

(a) The baghouses and cyclones have applicable compliance monitoring conditions as specified below:

(1) Visible emissions notations of the casting operations shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous

operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(2) The Permittee shall record the total static pressure drop across CB-1, CB-2, CB-3, CB-4, CB-5, CB-6, CB-7 and CB-8 controlling the casting operations, at least once per shift when the casting process is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the CB-1, CB-2, CB-3, CB-4, CB-5, CB-6, CB-7 and CB-8 shall be maintained within the range of 1.0 to 5.0, inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

(3) An inspection shall be performed each calender quarter of all bags controlling the operations at this source when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

(4) In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary the baghouses and cyclones for the casting process must operate properly to ensure compliance with 326 IAC 6-3-2 (Process Operations).

Conclusion

The operation of this nickel, aluminum, brass and sand casting processing source shall be subject to the conditions of the attached proposed Minor Source Operating Permit 039-13601-00202.

Appendix A: Emission Calculations
Baghouse and Cyclone Operations

Company Name: **Crosbie Foundry Company, Inc.**
Address City IN Zip: **1600 Mishawaka Street, Elkhart, Indiana 46514**
FESOP: **039-13601**
Plt ID: **039-00202**
Reviewer: **Paula M. Cognitore**
Date: **December 8, 2000**

Unit ID	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)
CC-1, CB-1, CB-2	2.20	9.64	0.00055	0.00241
CC-2, CB-3	1.11	4.86	0.00028	0.00123
CC-3, CB-6	1.11	4.86	0.00028	0.00123
CC-4	7.01	30.70	0.35050	1.53519
CC-5	6.09	26.67	0.30450	1.33371
CB-4, CB-5	0.375	1.64	0.00375	0.01643
CB-7	1.66	7.25	0.08275	0.36245
CB-8	1.24	5.43	0.06195	0.27134
TOTAL PM:	**20.8**	**91.1**	**0.805**	**3.52**
***TOTAL PM10:**	**18.7**	**82.0**	**0.724**	**3.17**

Based on 1999 Emission Equipment Recovery and Normalized to 8,670 hours

* Based on a conservative estimate of 90% PM = PM10 from AP-42

	Lead Emissions	
Scaling Factor	1996 emissions (tons/yr	Lead (tons/yr)
2.61	0.23	0.600

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: **Crosbie Foundry Company, Inc.**
Address City IN Zip: **1600 Mishawaka Street, Elkhart, Indiana 46514**
MSOP: **039-13601**
Plt ID: **039-00202**
Reviewer: **Paula M. Cognitore**
Date: **December 8, 2000**

One (1) core machine rated at 0.108 mmBtu/hr
One (1) water heater rated at 0.034 mmBtu/hr
Four (4) furnaces rated at 0.0825, 0.1, 0.08 and 0.125 mmBtu/hr
Five (5) infrared heaters rated at 0.03 mmBtu/hr, each
Two (2) infrared heaters rated at 0.06 mmBtu/hr, each
Two (2) infrared heaters rated at 0.10 mmBtu/hr, each

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.000	8.76

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.008	0.033	0.003	0.438	0.024	0.368

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: **Crosbie Foundry Company, Inc.**
Address City IN Zip: **1600 Mishawaka Street, Elkhart, Indiana 46514**
Part 70: **039-13601**
Plt ID: **039-00202**
Reviewer: **Paula M. Cognitore**
Date: **December 8, 2000**

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	9.193E-06	5.253E-06	3.283E-04	7.880E-03	1.488E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.189E-06	4.816E-06	6.129E-06	1.664E-06	9.193E-06	0.008

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.